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**Remarks**

Claims 1-19 are pending in the application and are presented for reconsideration. Claims 1 and 11 have been amended. Claims 2-10 and 12-17 remain in the application unchanged. Claims 18 and 19 are new. No new matter has been added.

***Claim Rejections***

Claims 1, 3-5, 7-12 and 15 are rejected under 35 U.S.C. § 102(b) as being anticipated by Teodosio et al. (U.S. Pat. No. 6,121,966).

Claims 2 and 6 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Teodosio et al. in view of Wood et al. (US 2004/00006425 A1).

Claims 13, 14, 16, and 17 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Teodosio et al.

The Examiner's rejections of the claims are respectfully traversed.

**Response to Rejections of Claims Under 35 U.S.C. § 102/103*****a. Claims 1-10 and 19***

Applicant's amended claim 1 recites:

A graphical user interface displayable on a display screen, comprising:

a panning window interface comprising:

a high-level map structure panel for displaying a map structure on a first image scale;

a panning window which is movable from a first position in the high-level map structure panel to a second position in the high-level map structure panel by way of a continuous panning motion from the first position to the second position to select a sub-portion of said displayed map structure; and

a detailed sub-structure panel which displays said selected sub-portion of said map structure on a second image scale greater than said first image scale.

***The Teodosio Reference***

The Examiner cites Teodosio as anticipating Claim 1. In particular, the Examiner states that Teodosio discloses a graphical user interface displayable on a display screen, comprising: a panning window interface comprising: a high-

level map structure panel for displaying a map structure on a first image scale (Teodosio, col. 3, lines 19-21); a panning window which is movable in a panning motion to select a sub-portion of said displayed map structure (Teodosio, col. 3, lines 29-33); and a detailed sub-structure panel which displays said selected sub-portion of said map structure on a second image scale greater than said first image scale (Teodosio, col. 3, lines 39-41; Fig. 3).

In reply to the Applicant's arguments filed on June 14, 2007, wherein the Applicant argued that Teodosio does not teach or suggest "a panning window which is movable in a panning motion to select a sub-portion of said displayed map structure", Applicant has amended Claim 1 to more particularly distinguish Claim 1 over Teodosio. In particular, Claim 1 now recites "a panning window which is movable from a first position in the high-level map structure panel to a second position in the high-level map structure panel by way of a **continuous** panning motion". Support for this limitation may be found in the Applicant's specification at least at page 16, lines 1-5, wherein a panning window 130 is described as *movable* to allow the operator to select a portion of interest of the high-level map structure 160 that is displayed in the high-level map structure panel 120. The panning window 130 may be *moved using a standard drag-and-drop mouse operation*. Thus, the content of the image within the panning window changes continuously with continuous movement of the boundaries of the panning window.

As described in the Applicant's arguments filed on June 14, 2007, Teodosio discloses an overview image 300 that is partitioned into a plurality of **discrete** framed images. A user can select any position within the overview image, prescriptions the cursor (e.g., mouse button), and an enlarged image of the frame in which the cursor is selected is displayed in a detail window 320. Importantly, as clearly shown in FIG. 3 and as claimed in Teodosio's Claim 1, the image displayed in the detail window 320 is a **discrete** image frame corresponding to the image frame associated with the area bounded by the boundaries of the selected discrete framed image in the overview image 300. Teodosio's system cannot allow continuous panning movement of the detail

window 320 because Teodosio's system only displays a **discrete** image corresponding to a selected frame. Thus, Teodosio's system only allows selection of one mutually exclusive frame from a plurality of image frames. Accordingly, Teodosio does not teach or suggest "a panning window which is movable from a first position in the high-level map structure panel to a second position in the high-level map structure panel by way of a **continuous** panning motion" as recited in Applicant's Claim 1.

Under 35 U.S.C. § 102, a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628 (Fed. Cir.), *cert. denied*, 484 U.S. 827 (1987). Since Teodosio does not meet each and every limitation of Applicant's claim 1, per *Verdegaal Bros., Inc., supra*, Teodosio cannot be used in formulating an anticipation rejection under 35 U.S.C. § 102.

#### ***The Wood et al. Reference***

Teodosio cannot be combined with Wood to make up for the deficiencies of Teodosio in meeting Applicant's Claim 1. Wood does not teach or suggest a "a panning window which is movable from a first position in the high-level map structure panel to a second position in the high-level map structure panel by way of a **continuous** panning motion". Wood discloses displaying a map image 30A in a graphical user interface window. This is the only map displayed. Accordingly, map 30A can only be equated with one or the other of Applicant's "a high-level map structure panel for displaying a map structure on a first image scale" and "a panning window which is movable in a panning motion to select a sub-portion of said displayed map structure". While Wood does disclose that the map 30A may shift when the panning cursor is activated, the panning occurs across the entire displayed window and therefore does not select a sub-portion of "said *displayed* map." The map 30A, whether panning or not, can only be equated with one or the other of Applicant's "high-level map structure" and "panning window". Wood simply does not show a panning function which selects a sub-portion of a *displayed* map. Wood only discloses panning a displayed map

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to display previously undisplayed portions of a map, and to remove previously displayed portions of the same map. This is not the same as selecting a sub-portion of a currently displayed high-level map structure. Accordingly, Wood does not make up for the deficiencies of Teodosio in meeting Applicant's Claim 1, namely, "a panning window which is movable in a panning motion to select a sub-portion of said displayed map structure." In addition, Wood also does not teach or suggest "a detailed sub-structure panel which displays said selected sub-portion of said map structure on a second image scale greater than said first image scale".

### **Summary**

Accordingly, in view of the above, none of Teodosio, Wood, or any of the other prior art of record, taken either alone or in any combination, meets each and every limitation of Applicant's claim 1. *Per Verdegaal Bros., Inc., supra*, therefore none of Teodosio, Wood, or any of the other prior art of record, can be used in formulating an anticipation rejection of Claim 1 under 35 U.S.C. § 102. Furthermore, since none of Teodosio, Wood, or any of the other prior art of record, taken in any combination, teach the essential limitations "a panning window which is movable from a first position in the high-level map structure panel to a second position in the high-level map structure panel by way of a **continuous** panning motion", Teodosio, Wood, or any of the other prior art of record, cannot even be combined to formulate an obviousness-type rejection under 35 U.S.C. § 103. Accordingly, Applicant respectfully submits that the 35 U.S.C. § 102 rejection of Claim 1 should be withdrawn and that Claim 1 is now in position for allowance.

Claims 2-10 and 19 each depend from independent base Claim 1 and add further limitations. For at least the same reasons that Claim 1 is not shown, taught, or disclosed by the cited references, Claims 2-10 and 19 are likewise not shown, taught, or disclosed. Thus, Applicant respectfully submits that the rejection of claims 2-10 and 19 should be withdrawn.

Claim 19 is believed to be allowable on independent grounds because neither Teodosio nor Wood, nor any of the other prior art of record teaches or

suggests "wherein the continuous panning motion comprises a drag-and-drop action". Teodosio's system utilizes discrete image frames which are selected by the click of a cursor. The discrete image frames have fixed positions within the overall image and cannot be moved. Thus, a user cannot utilize a drag-and-drop action of the mouse to move the contents of the detail window. Thus, Claim 19 is believed allowable over the prior art.

**b. Claims 11-18**

Claim 11 recites similar limitations to Claim 1, including "providing a panning window which is movable from a first position in the high-level map structure panel to a second position in the high-level map structure panel by way of a *continuous* panning motion...." For at least the same reasons that Claim 1 is not shown, taught, or disclosed by the cited references, Claim 11 is likewise not shown, taught, or disclosed. Thus, Applicant respectfully submits that the rejection of Claim 11 should be withdrawn.

Claims 12-18 each depend from independent base claim 11 and add further limitations. For at least the same reasons that Claim 11 is not shown, taught, or disclosed by the cited references, Claims 12-18 are likewise not shown, taught, or disclosed. Thus, Applicant respectfully submits that the rejection of claims 12-18 should be withdrawn.

Claim 18 is believed to be allowable on independent grounds because neither Teodosio nor Wood, nor any of the other prior art of record teaches or suggests "wherein the continuous panning motion comprises a drag-and-drop action".

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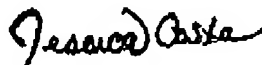
Conclusion

In view of the foregoing remarks, it is respectfully submitted that none of the references cited by the Examiner taken alone or in any combination shows, teaches, or discloses the claimed invention, and that Claims 1-19 are in condition for allowance. Reexamination and reconsideration are respectfully requested.

Should the Examiner have any questions regarding this amendment, or should the Examiner believe that it would further prosecution of this application, the Examiner is invited to call the undersigned.

Respectfully submitted,

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Jessica Costa, Reg. No. 41,065

The Law Offices of Jessica Costa, PC  
P.O. Box 460 Crozet, VA  
22932-0460  
(434) 823-2232  
(434) 823-2242 (fax)